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## INTERMOUNTAIN POWER SERVICE CORPORATION

January 15, 1987

File: 01.03.10

Mr. Burnell Cordner
Executive Secretary
Utah Air Conservation Committee
Utah Bureau of Air Quality
288 North 1460 West
P.O. Box 16690
Salt Lake City, Utah 84116-0690

Subject: Fugitive Emission Control for the Limestone Unloading and the Coal Unloading and Storage Facilities at the Intermountain Generating Station.

Dear Mr. Cordner:

In response to your letter of October 29, 1986, page 4, items 1 and 2, we offer the following corrective action proposals and time schedules to comply with the UBAQ's fugitive emissions requirements as defined in our Approval Order of December 18, 1985.

- I. Coal Stacker and Coal Reserve Stockout Telescopic Shutes.
  - A. Install a rubber skirt at the end of the telescopic chute. Midwest International manufactures a double layer gum rubber skirt for telescopic chutes which reduces the material fall in free air to almost zero. The rubber skirt is slit every one foot around its circumference for the full length. The two inch thick layers are lapped with the slits staggered by six inches. The skirt is almost always in contact with the coal pile and the probes are activated by the skirt being pushed out by the material as the pile is formed. The skirt will be approximately six feet long. The cost for the coal stacker skirt is estimated at \$8,000. The cost for the coal reserve stockout chute skirt is estimated at \$4,000. The installation will be completed in approximately 90 days from January 15, 1987.
- II. The Active Coal Storage Pile.
  - A. We have contacted an organization called FOMIS (Fossil Operating and Maintenance Information Service) concerning coal fugitive dust control methods on active storage piles used at other power plants.

Brush Wellman Road, Delta, Utah / Mailing Address: Rt. 1, Box 864, Delta, Utah 84624 / Telephone: (801) 864-4414

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FOMIS is an information exchange service that utilities may belong to in which information may be shared between various utilities. As we become aware of methods to control the fugitive dust on the active coal storage pile, we will inform the UBAQ. After obtaining this information, we will implement a possible solution within 180 days from January 15, 1987.

## III. Reserve Coal Pile.

- A. The reserve coal pile will be sealed to control fugitive dust emissions by approximately October 14, 1987.
- IV. Limestone Truck Unloading Hopper.
  - A. Black and Veatch, our A/E, has suggested installing Burnley baffles below the existing hopper grillage. These baffles manufactured by United McGill Corp. are counter-weighted baffles which open in sections by the material discharging into the hopper. We are uncertain as to the effectiveness of the retrofit at this time. A representative from the United McGill Corp. will be meeting with Craig Lucy on February 4, 1987 to inspect the existing limestone unloading operation and determine if the Burnley baffles will adequately control fugitive dust. The estimated cost to install the Burnley baffles to the existing grillage is \$9,000. If this shows to be feasible, the approximate installation completion date would be 90 days from February 4, 1987.
  - B. Jerry Pruett of the Los Angeles Department of Water and Power (LADWP) and Craig Lucy visted the Continental Lime, Inc. processing plant on January 13, 1987 to examine the truck loading and crushing operation. Craig and Jerry will be conducting a limestone fineness test during the week of February 23, 1987 to determine if the contractural agreements are met for the material size.

Irwin Stein of LADWP has informed Craig that treating the limestone at the mine to control the amount of fine material would cost approximately \$2.00 per ton of delivered limestone. With a limestone consumption of approximately 90,000 tons per year for Units 1 and 2, it would cost IGS \$180,000 per year to control fugitive limestone emissions. We feel that this method to control fugitive dust is too costly for emissions that will occur only six-20 second periods per day during a five day working period.

We will inform the UBAQ of our progress to control excessive limestone fugitive emissions during the unloading operation.

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- V. Limestone Telescopic Chute Stockout.
  - A. Install a Midwest International double layer gum rubber skirt. The estimated cost is \$2,900. The installation will be completed in approximately 180 days from January 15, 1987.

We will implement the coal stacker telescopic chute rubber skirt addition within 90 days of this letter. If this skirt resolves our opacity exceedances, we will install additional skirts to the coal reserve telescopic and the limestone telescopic chutes.

If you have any questions or comments, please contact Mr. Dennis Killian, IPSC's Station Engineer, at (801) 864-4414, extension 6401.

Sincerely,

Intermountain Power Service Corporation

S.G. Chapman Ey, PURDOS.

President & Chief Operations Officer

SGC/CL: Edt

cc: Bruce E. Blowey
Don Waters
Phil Tice
Irwin Stein
Roger Pelote